COPY TO:

J. HUDER

TO SITE FICE

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION II**

DATE:

NOV 1 5 1993

Canadian Radium & Uranium Site

SUBJECT:

Paul M. Giardina, Chief Radiation Branch

FROM:

Air & Waste Management Division

TO: Vincent Pitruzzello, Chief Program Support Branch Emergency and Remedial Response Division

The purpose of this memorandum is to provide you with suggestions, which if carried out, I believe may facilitate any required response actions at the Canadian Radium & Uranium Site ("Site"). As you know, the preliminary data shows the presence of indoor radon gas and of surface soils emitting gamma radiation. It identifies the Town/Village of Mount Kisco as the owner of the real property and a private person as the owner/operator of Richard's Lumber Yard.

First, I suggest that EPA perform an expedited search for potentially responsible parties ("PRPs") to determine whether or not the Town/Village is a PRP and if any other PRPs exist. search might include a reexamination of DOE's claim that the Site is not eligible for response actions under FUSRAP. Once this is accomplished EPA could discuss with the PRPs the installation of a radon mitigation system paid for with private funds or with grant monies. If one is installed prior to or during the performance of a Site Investigation ("SI"), which I understand will commence at the end of November, any risks at the Site could be lowered to the benefit of the occupants and could eliminate a route of exposure used to invoke jurisdiction under CERCLA.

Second, as always, we must do our best to ensure that the SI will provide enough data to ascertain whether a sufficient risk exists under CERCLA. I agree with Dennis Santella that the Radiation Branch review the SI work plans. I suggest that we also review the SI data as it arrives before QA/QC procedures in order to make a preliminary determination that they are representative of conditions at the Site and perhaps to anticipate whether response actions are required. This is particularly important since the State and County Health Departments may be issuing guidance to the owner of the lumber yard and its workers regarding length of exposure in various locations at the Site.

I hope these suggestions will aid in the investigation and remediation of the Site. Please contact me at your earliest convenience to discuss them. I can be reached at x4410.

cc:\D. Santella, ERRD-PSB

- M. Buccigrossi, AWM-RAD
- A. Carpenter, AWM-RAD
- E. Stamataky, AWM-RAD